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December 22, 2015

BY ECF & FACSIMILE

The Honorable George B. Daniels United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Flores v. Sea Breeze Fish Market Inc., et al.

15-CV-8452 (GBD)

Dear Judge Daniels:

We represent Defendants Sea Breeze Fish Market Inc., Vincent J. Dimino, and Michael Turco (the "Defendants") in the above-referenced matter. We write to respectfully request a thirty-day extension of the time for the Defendants to respond to the Complaint in this matter. The Defendants' answer is currently due December 28, 2015. The Defendants request an extension of time to respond to the Complaint because the parties are currently engaged in good faith settlement discussions which we believe will result in the resolution of this matter.

This is Defendants' first request for an extension of time to respond to the Complaint. Counsel for Plaintiff Andres Trinidad Flores has consented to this request.

Respectfully submitted,

Justin A. Greenblum

JAG:

cc: VIA ECF

John Gurrieri, Esq.